

My earlier comprehensive document on the use of translators by AM stations needs a bit of clarification. I and many other respondents have stated that licensees who own an FM station in the same area as the AM station seeking a translator should be prohibited from getting that translator because the AM station is not a stand alone. I did not intend for this to forever exclude non stand alone AM stations from getting FM translators. It is my belief that stand alone stations should have FIRST preference for assignment of translators. In a market where for instance there are two FM stations and one AM station and the AM is co owned with one of the FM stations, the AM *would* be allowed to have the translator since there is not a mutually exclusive situation. However if 2 or more AM stations are attempting to get the same translator assignment, then the AM station that is a stand alone would get first pick.

As part of what should be an overhaul of the entire translator situation, the Commission needs to make the use of translators by stations extreme distances away from the translator service area strictly **secondary** to translators that are fed by local stations.

As an example, when allowing a station in San Francisco (i.e. KEAR FM) to program translators all over the Midwest and East, via satellite, it seems that the fact the supplying station is AM or FM makes no difference. The important part is that no station in California should be able to operate a translator in Michigan or Indiana that precludes use of the frequency by a LOCAL station. The use of translators to form ad hoc networks should be abolished! The entire concept of having translators fed by satellite from stations thousands of miles away is simply wrong. If an organization wishes to form a radio network then the stations airing the programming should be licensed locally based stations that carry the network programming as part of their normal broadcast day. (i.e National Public Radio, ABC or CBS)

Translators should not be used to force feed the programming of a single station to hundreds of markets across the nation with the local listeners having no input into what the station does. Local licensed stations are subject to community input, access to the Public File and an expectation that programming will fulfill a true local need.

Translators which simply rebroadcast satellite fed signals from licensed stations thousands of miles away offer nothing in the way of local input or accountability. If an organization wants that type of reach, then they should use resources other than the public airwaves. For instance they can do such programming over the Internet which does not exhaust limited local spectrum and still provides high quality.

The use of a translator to extend a station past a natural barrier like mountains does not violate the spirit of the original proposals that led to translators because the station is still somewhat local, and can be responsive to the needs of the community the translator is serving since it is only slightly extending or filling in the coverage of the primary station.

To better illustrate the point; if any organization approached the FCC and asked to have hundreds of Class A FM stations licensed all over the country with the desire to feed them all with a continuous satellite signal and no local origination and request special exemption from the Public File regulations and an additional exemption from the quarterly showing of issues and programming that is responsive to local needs, the Commission would laugh. But that in effect is exactly what has been done with the current situation that allows hundreds of translators to be satellite fed with no local accountability. **No** local studio, **no** local phone number, **no** Public File, **no** local access of any kind. To the urban listener, a 250 watt translator *in town* sounds just like a 50,000 Full Power FM so if the Commission would not allow such network operation of regular FM or AM stations it should not be allowed on translators.

Some of this can be blamed on modern technology. When translators were first allowed decades ago, there really was no cost effective way to feed hundreds of stations in remote areas because you would have had to use hardwired networks that employed leased phone lines to cover thousands of miles (remember AT&T Long Lines?) Translators were limited to rebroadcasting stations that could be picked up off the air. That kept these large ad hoc networks from being formed. But with the advent of small dish satellite systems, translators can be thrown up almost anywhere and fed in a matter of hours. If the Commission feels that they should continue to allow distant stations feeding translators, such translators should operate only on a tertiary or secondary basis. And be bumped if a local station needs the frequency. The concept is not new. New full time Local stations bump translators all the time. Local translators should bump distant fed translators, plain and simple.

While I am sure the following position will not be popular with everyone, I submit that translators should be allowed in the **reserved band** which are fed by LOCAL commercial stations. But the use of the reserved band frequency by a commercial station would be secondary to the use of that same facility by a LOCAL NCE station needing a translator. In other words use of any *newly licensed* translator should be based on a series of preferences. In the reserved band it would be:

1. Local NCE FM (off air feed only)
2. Local NCE AM (inside 2mv Day contour only)
3. Local Commercial AM (inside the 2mv Day service area)
4. Distant NCE AM or FM
5. Any translator fed by another translator

In the regular FM band it would be:

1. Local AM stand alone. (Inside 2mv Day contour)
2. Other AM (Inside 2mv Contour)
3. FM (true fill in, not to extend coverage past 50 dbu)
4. Distant FM, beyond xxx kilometers, any feed.
5. NCE station AM or FM

Respectfully submitted,

Larry Langford

LarryLangford@aol.com